

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING  
(UPS PROPOSALS ONE, TWO, AND THREE)

Docket No. RM2016-2

**UNCONTESTED MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR ACCESS TO MATERIALS FILED UNDER SEAL  
BY UNITED PARCEL SERVICE  
(October 9, 2015)**

At the initiation of this proceeding on October 8, 2015, UPS submitted under seal a folder containing nonpublic materials, labeled as UPS-RM2016-2/LR-NP1. Based on the Notice accompanying the filing of that folder, it appears that the material intended to be shielded from disclosure is material originally provided under seal by the Postal Service in Docket ACR2014. UPS first obtained access to that material pursuant to Order No. 2321 (January 15, 2015), and has obtained continued access pursuant to Order Nos. 2326 (January 16, 2015), 2436 (April 13, 2015), and 2584 (July 15, 2015). UPS is appropriately filing this material under seal, in other words, only to stay in compliance with the terms of the protective conditions under which it obtained access to the nonpublic information of the Postal Service. Therefore, since the nonpublic information in question is its own, the Postal Service now seeks access to the nonpublic material filed by UPS as UPS-RM2016-2/LR-NP1, under the same conditions applicable when the Commission likewise issues nonpublic materials that incorporate nonpublic information obtained from submissions by the Postal Service. Similar requests from the Postal Service were granted under identical circumstances in the pending city carrier costing proceeding (Docket No. RM2015-7) in Order Nos. 2538 (June 9, 2015) and

2607 (July 23, 2015). The Postal Service has been authorized to state that UPS does not object to this motion.

The Postal Service further notes that, if additional material is filed under seal in this proceeding, based exclusively on the commercial sensitivity of material originally submitted by the Postal Service under seal in this or any previous docket, the Postal Service supports immediate access to that new material by all individuals who already have proper access to those original materials, either as the originator (i.e., the Postal Service), or by virtue of execution of protective conditions (e.g., representatives of UPS).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 277-6333  
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